

## **Key Points on Minimizing Viewer Disruption in Spectrum Incentive Auctions**

### **UNITY Journalists for Diversity**

- UNITY: Journalists for Diversity is a strategic alliance advocating for fair and accurate news coverage about diversity; especially race, ethnicity, gender identity and sexual orientation. Representing more than 10,000 journalists, UNITY is comprised of four national associations: Asian American Journalists Association (AAJA), National Lesbian and Gay Journalists Association (NLGJA), National Association of Hispanic Journalists (NAHJ), and the Native American Journalists Association (NAJA).
- In our capacity as an advocate for diversity in journalism, UNITY seeks to encourage the Federal Communications Commission to keep minority communities in mind in all of its proceedings, and in this case, the activities that take place after the spectrum auction concludes.
- We share the concerns voiced in a letter authored by the members of the Congressional Tri-Caucus expressed that the possible post-auction relocation of local broadcast television stations that choose not to sell their spectrum may result in a loss of service for minority viewers.
- As UNITY noted in our filing in December on the media ownership review, “The reality for people of color and women today is a vicious combination of limited media ownership opportunities and increasing consolidation that has pushed out or threatens to push or keep out these underrepresented groups. And as these owners are forced out, so goes the diverse programming they fought hard to bring to the public....”
- As the Tri-Caucus noted, the dependence of minority communities on over-the-air television far outpaces that of other communities, and UNITY expects that as our communities continue to seek affordable options for information and entertainment, those numbers will increase.
- And because minority communities tend to rely more heavily on free television, we would be disproportionately negatively affected by the repacking process if some viewers lose access to their TV stations.
- While we continue to see minority ownership on the decline, opportunities are actually increasing for minorities to produce programming on free television that is relevant to and compelling for our communities.
- The DTV transition offered minorities a lower barrier to entry in ownership via multicast programming, and as a result an increasing number of multicast networks and programs that serve minority communities are available to minority viewers.

- Last year the nation's first African-American broadcast television network launched across the country. And across the U.S., programs broadcasting in Spanish and Asian languages to Hispanic and Asian communities are reaching audiences with in-language programming like never before.
- If stations are forced off the air or are no longer viewable in various areas, minorities will be miss out on the news, weather and entertainment that they both rely upon and enjoy.
- At a time when minorities are able to view – and actually provide – more diverse programming than ever, UNITY is concerned about any measures that would limit the reach of free television service to minority communities.
- In an otherwise challenging media environment, multicast programming is a beacon of hope for minority communities to develop, distribute and view programming that serves our own communities.
- We ask that the Commission carefully consider any measures that could hinder the progress of this promising development in diversity in media.